

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-cv-00950-LO-JFA

**CONFIDENTIAL DECLARATION OF BRENT K. BECK
IN SUPPORT OF COX'S OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL**

I, Brent K. Beck, declare as follows:

1. I am a Software Engineer II working at Cox Communications, Inc. I have worked for Cox since 2001, and I have been involved with Cox's Cox Abuse Tracking System ("CATS") since 2007. I submit this declaration in support of Cox's opposition to Plaintiffs' motion to compel production of documents. I have personal knowledge of the facts stated in this Declaration, and if called as a witness, could testify competently to the matters contained herein.

2. Cox receives emails about numerous different kinds of issues, generically termed "abuse" issues. So-called abuse emails include notices of alleged copyright infringement, as well as notices unrelated to infringement.

3. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

4. [REDACTED]

5. [REDACTED]

6. [REDACTED]

7. [REDACTED]


I estimate that to extract the complaints associated with tickets from 2010-2014, [REDACTED]
[REDACTED], it would take approximately two to four weeks of around-the-clock computer processing time. I further estimate that doing so would require approximately two to four days of engineer time.

8. I estimate that the resulting data would occupy roughly 78 gigabytes of storage space, and if printed would be well in excess of ten million pages.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed at Atlanta, Georgia .

Executed on December 19, 2018



Brent K. Beck